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Attorneys for Defendant Wells Fargo Bank, N.A.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANNIE CHANG, TIGER CHANG
INVESTMENTS, LLC, ASIANS
INVESTING IN REAL ESTATE, LLC,
MELANIE GONZALES, GARY
GONZALES, and G&M YOU-NIQUES
PROPERTY LLC, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

CASE NO. 4:19-cv-01973-HSG

**AMENDED STIPULATED FINAL
JUDGMENT**

1 Plaintiffs Annie Chang, Tiger Chang Investments, LLC, Asians Investing in Real Estate,
 2 LLC, Melanie Gonzales, Gary Gonzales, and G&M You-Niques Property LLC, (together,
 3 “Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) (collectively, the “Parties”),
 4 by and through their undersigned counsel, hereby agree and stipulate that based on the papers filed
 5 with the Court, presentations made to the Court by the Parties, the Final Approval Order [Dkt. 147],
 6 and the November 14, 2023 Order [Dkt. 149] the following Amended Final Judgment be entered:

7 **STIPULATED FINAL JUDGMENT**

8 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

9 1. All findings in the Court’s Final Approval Order [Dkt. 147] shall be incorporated in
 10 this Judgment.

11 2. **Definitions.** This Judgment incorporates by reference the definitions in the Settlement
 12 Agreement and Release (“Agreement”), and all capitalized terms used, but not defined herein, shall
 13 have the same meanings as in the Agreement.

14 3. **No Merits Determination.** By entering this Order, the Court does not make any
 15 determination as to the merits of this case.

16 4. **Dismissal with Prejudice.** Final Judgment is hereby entered with respect to the
 17 Released Claims of all Settlement Class Members, and the Released Claims in the Action are hereby
 18 dismissed in their entirety with prejudice and without costs. All claims in the Action are dismissed,
 19 and the case shall be closed pursuant to Paragraph 9 of this Order.

20 5. **Releases.** The releases as set forth in Section 10 of the Agreement together with the
 21 definitions in Sections 1.1-1.44 relating thereto are expressly incorporated herein in all respects and
 22 made effective by operation of this Judgment. The Court hereby approves and enters as Final
 23 Judgment the release provisions as contained and incorporated in Section 10 of the Agreement,
 24 including but not limited to the definitions of Released Claims, Releasors, Releasees and Unknown
 25 Claims. The Releasors shall be deemed to have, and by operation of this Judgment shall have, fully,
 26 finally, and forever released, relinquished, and discharged all Released Claims (including Unknown
 27 Claims) against the Releasees.

28 6. **Permanent Injunction.** The Releasors, including the Class Representatives and all

1 Settlement Class Members, and anyone claiming through or on behalf of any of them, are forever
2 barred and enjoined from filing, commencing, maintaining, prosecuting, intervening in, participating
3 in (as class members or otherwise), or pursuing directly, representatively, or in any other capacity
4 any Released Claim subsumed and covered by the Release in the Agreement in any court or
5 arbitration forum. The Releasers further are forever barred and enjoined from organizing Class
6 Members, or soliciting the participation of Class Members, in a separate class for purposes of
7 pursuing any action (including by seeking to amend a pending complaint or counterclaim to include
8 class allegations, or seeking class certification in a pending action in any jurisdiction) based on or
9 relating to any of the Released Claims against any of the Releasees.

10 7. **Continuing Jurisdiction.** Without affecting the finality of this Judgment in any way,
11 this Court hereby retains continuing jurisdiction over the administration, consummation,
12 enforcement, and interpretation of the Agreement, the Final Judgment, and for any other necessary
13 purpose, including to ensure compliance with the Protective Order entered in this Action.

14 8. **Entry of Final Judgment.** There is no just reason for delay in the entry of this Order
15 and Final Judgment and immediate entry by the Clerk of the Court is hereby directed.

16 9. **Action Closed.** The Clerk of the Court is hereby directed to close the Action.

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1 DATED: November 17, 2023

MCGUIREWOODS LLP

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Attorneys for Plaintiffs and the Class

27 **IT IS SO ORDERED.**

28 Date: _____

By: _____
Honorable Haywood S. Gilliam, Jr.

ATTESTATION

I attest that all signatories listed above, and on whose behalf this Stipulated Final Judgement is submitted, have concurred with and authorized the filing thereof.

/s/ Jenny Yi
Jenny Yi

CERTIFICATE OF SERVICE

I, Jenny Yi, certify that on November 17, 2023, the foregoing document entitled **AMENDED STIPULATED FINAL JUDGMENT** was filed electronically in the Court's ECF; thereby upon completion the ECF system automatically generated a "Notice of Electronic Filing" as service through CM/ECF to registered e-mail addresses of parties of record in the case.

/s/ Jenny Yi

Jenny Yi